

Response to Comment Letter I82

Patricia and Elliott Stuart

February 19, 2014

I82-1

The County of San Diego (County) agrees that the Proposed Project would result in the clearing of vegetation on each of the solar farm sites (which include Tierra del Sol and the gen-tie, Rugged, LanEast, and LanWest). However, the Proposed Project would not result in a total of 2,943 acres of land cleared. As described in Section 2.3 of the Draft Program Environmental Impact Report (DPEIR), the combined impacts of Tierra del Sol, the Tierra del Sol gen-tie, and Rugged would be approximately 945 acres. Direct impacts on the LanEast and LanWest sites could total an additional 288 acres, although impacts would likely be less due to the avoidance of all Resource Protection Ordinance areas, including wetlands and oaks (*Quercus* sp.). Therefore, the Proposed Project would not exceed 1,233 acres of direct impacts to vegetation communities.

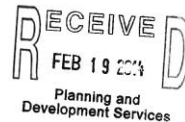
I82-2

The County acknowledges the commenters' concern related to groundwater. Several studies have been prepared that analyzed groundwater for purposes of the Proposed Project; please refer to Appendices 3.1.5-5, 3.1.5-6, 3.1.5-7, and 3.1.5-8. Also, please refer to Section 3.1.5.3.1, Hydrology and Drainage Patterns, and Section 3.1.5.3.4, Groundwater Resources, of the

Comment Letter I82

February 12, 2014

County of San Diego
Planning & Development Services
Project Processing Center
5510 Overland Avenue, Ste 110
San Diego, CA 92123



RE: Soitec Solar Development in Boulevard, CA 91905

The impact this project would have on our community would be devastating, not only to the land owners, but it would greatly impact all of the citizens of San Diego County. Our area is the last open refuge for people to be able to travel to in under an hour that is filled with wide open vistas, wonderful native plants and chaparral, clean air, bright blue sky, calming quiet, the ability to roam free with no traffic, hiking trails, bike trails, horse trails. All that will be destroyed with this project.

Installing these huge photovoltaic trackers would necessitate the land to be cleared of all Native Chaparral down to a depth to remove all of the root system over a total area 1,473 Acres with an additional 1,450 acres being proposed, bringing the total to a WHOPPING 2,923 ACRES. The desecration of the land alone should be enough to stop this project.

With no Chaparral, any rain that falls would not be tempered by the plants and be able to enter into our soil to help replenish our ground water, it would hit the bare ground and simply run off, creating mud and silt slides and carving up the bare land. We live on our ground water, and are in a drought. There has not been a study done by the county of our ground water in many years, possibly decades. This study must be conducted and available for review before any thought of progressing with this project. The county is responsible to protect it's citizens and their water supply.

I worked for 10 to 12 years serving first on the Boulevard Sponsor Group and then elected to the newly formed Boulevard Planning Group. There was never any Industrial area considered or zoned in our plan; only Agricultural, Residential and Commercial. The Industrialization of Boulevard was foisted on us by the County, the PDS department. We were never involved with any decision making in the process. This should never have occurred. Apparently Big Business and Deep Pockets has brought this about. Again, it is the County's responsibility to defend and protect the Boulevard citizenry.

We live in a Fire-prone area and the huge panels will negatively impact any attempt to control or contain fires and protect our residences and our lives. Building a new Fire Station in Boulevard is not the answer, stopping the project is the answer.

The proposed Los Robles project is directly across a private road and could put the panels within 100 ft to the West of my home. The wind mostly comes from the West and can be quite ferocious many days. With the bare land under the panels, there will

I82-1

I82-2


I82-3

I82-4

I82-5

	<p>DPEIR. These sections consider and address potential impacts to water quality due to erosion and potential impacts to groundwater recharge.</p> <p>I82-3 The Proposed Project sites have a land use designation of RL80 (Rural Lands) and are zoned A70 (Limited Agricultural Use), A72 (General Agricultural Use), and S92 (General Rural Use) (DPEIR, Sections 2.5.1.3, 2.5.1.4, 2.5.1.5, and 2.5.1.6). The DPEIR determined that the proposed solar farm use is consistent with this land use designation, as well as with the zoning classifications as a civic use type and major impact services and utilities use type with the approval of a Major Use Permit (DPEIR Section 2.5.3.1) The Proposed Project sites are not zoned industrial, and do not require such zoning to accommodate the Proposed Project. The commenters' disagreement with the County's purported "industrialization of Boulevard" through previous changes in zoning or the Boulevard Subregional Plan has no bearing on the Proposed Project's potential impacts with regard to land use and planning, as the Proposed Project will be consistent with the County Zoning Ordinance and the Boulevard Subregional Plan (County of San Diego 2013).</p> <p>The remainder of the comment does not raise an environmental issue for which a response is required. However, the commenters' opposition to the Proposed Project and their opinions with regard to the County's</p>
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	<p>responsibilities will be provided in the Final Program Environmental Impact Report (FPEIR) for review and consideration by the decision makers.</p> <p>I82-4 The County acknowledges the commenters' concern with fire risk in the Boulevard area and fire hazards associated with the Proposed Project. Please refer to the responses to comments I2-2 and O10-82.</p> <p>The information in this comment letter will be provided in the FPEIR for review and consideration by the decision makers.</p> <p>I82-5 Fugitive dust impacts are analyzed in Section 2.2.3.2 of the DPEIR. Particulate matter (PM₁₀ and PM_{2.5}) emissions were estimated for the Proposed Project and project design features have been identified to reduce impacts related to fugitive dust emissions. See also the responses to comment I27-2 regarding fugitive dust issues and mitigation.</p> <p>The commenters believe that dust storms and evaporation of groundwater will occur due to heating effects of the solar panels. See the response to comment I1-1. Accordingly, the County does not agree that heating of the ground surface would occur and create dust storms. As indicated in Section 3.1.5 of the DPEIR, depth to groundwater varies from tens to hundreds of feet below the ground surface. At these depths, heating at the surface would not cause</p>
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<p>be temperatures underneath ranging into 160 degrees on our hot summer days baking the land and creating big DUST STORMS. My husband suffers from lung problems and that would greatly exacerbate the problem putting him at extremely high risk.</p> <p>The high temps generated under the panels are a great concern also. It would seem that could have a big impact on what little ground water we have at the present, drying it up and causing our wells to fail. There doesn't seem to be any sign of a change in our rainfall within the near future.</p> <p>Governor Brown is calling for Central and Northern California to conserve water to the degree he even suggested on the air that people not shower as often or as long and even not flush regularly. These present real health hazards. I understand that we have not yet fallen into the high risk they are in, but we certainly must not be very far behind, considering where our water comes from. The water that is used on these projects would be astronomical and totally unnecessary.</p> <p>Let's get some sense, put our solar ON-SITE, where it's needed and wanted, on roof-tops not in some far off location where it has to be shipped to its destination, loosing amps as it travels over the miles, and cluttering up the landscape with the huge power lines.</p> <p>California Public Utilities Commission has made the decision that SDGE has to underground its new 138KV line over 15 miles of dirt road here in Boulevard, rather than allowing the overhead 100 ft. poles, to SAVE OUR VIEW-SHED. This road is right beside the East of the Las Robles proposed site and directly to the West of my property and home. Hopefully the county will take the same example and stop this fiasco, STOP SOITEC PROJECT & SAVE OUR VIEW-SHEDS.</p> <p>Sincerely,</p>  <p>Patricia and Elliott Stuart 1633 Jewel Valley Rd. P.O. Box 1291 Boulevard, CA 91905</p> <p>Phone: 619-766-4040 e-mail: trish@sciti.com</p> <p>cc: Dianne Jacob, County Supervisor, 2nd District Board of Supervisors, San Diego County Jim Bennett, County Groundwater Geologist Juan Vargas, 51st Congressional District Brian Jones, State Assemblyman 71st District Donna Tisdale, Chair of Boulevard Planning Group</p>	<div data-bbox="945 251 1008 381">182-5 Cont.</div> <div data-bbox="945 511 1008 544">182-6</div> <div data-bbox="945 722 1008 755">182-7</div> <div data-bbox="1050 308 1144 349">182-6</div> <p>groundwater to evaporate. See DPEIR Section 3.1.5.3.4. Groundwater.</p> <p>The issues raised in this comment related to water use by the Proposed Project were considered and addressed in Chapters 3.1.5, Hydrology and Water Quality, and 3.1.9, Utilities, of the DPEIR. See also common response WR1 and WR2. The County acknowledges the information provided by the commenters regarding the current water shortages in California. The information in this comment letter will be provided in the FPEIR for review and consideration by the decision makers.</p> <div data-bbox="1050 763 1144 803">182-7</div> <p>The County acknowledges the commenters' support for a distributed-energy-generation alternative and underground gen-tie line. A distributed-generation alternative was considered but rejected for reasons as stated in Section 4.2 of the DPEIR; see common response ALT2. An underground Tierra del Sol gen-tie is considered in both Alternative 3 and Alternative 4 (see Section 4.3 of the DPEIR). As discussed in the DPEIR, an entirely underground gen-tie line would reduce visual impacts resulting from the Proposed Project; however, impacts to other resources such as air quality, biology, and cultural resources would be increased by the additional excavation and trenching activities required. Therefore, an underground gen-tie line is not recommended as the environmentally</p>
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	<p>superior alternative. Additionally, in regard to the comment that refers to the “Los Robles proposed site,” the County does not agree that Los Robles is a proposed site, but rather that it is considered as an alternative site in the DPEIR. The gen-tie line that is considered for the Los Robles alternative would be entirely underground.</p> <p>The decision makers will consider all information in the FPEIR and related documents before making a decision on the Proposed Project.</p> <p>References</p> <p>County of San Diego. 2013. <i>Boulevard Subregional Planning Area: Mountain Empire Subregional Plan</i>. August 2011; amended May 15, 2013. http://www.sdcountry.ca.gov/pds/docs/CP/Boulevard_CP.pdf.</p> <p>County of San Diego Zoning Ordinance. 2010. Ordinance No. 10072, Section 6952, Solar Energy System.</p>
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